

Ahilan T. Arulanantham (SBN 237841)
arulanantham@law.ucla.edu
CENTER FOR IMMIGRATION LAW AND
POLICY, UCLA SCHOOL OF LAW
385 Charles E. Young Dr. East
Los Angeles, CA 90095
Telephone: (310) 825-1029

Emilou MacLean (SBN 319071)
emaclean@aclunc.org
Michelle (Minju) Y. Cho (SBN 321939)
mcho@aclunc.org
Amanda Young (SBN 359753)
ayoung@aclunc.org
ACLU FOUNDATION
OF NORTHERN CALIFORNIA
39 Drumm Street
San Francisco, CA 94111-4805
Telephone: (415) 621-2493
Facsimile: (415) 863-7832

Attorneys for Plaintiffs
[Additional Counsel Listed on Next Page]

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, DENIS
MOLINA, JHONY SILVA, MARIA ELENA
HERNANDEZ, O.C., SANDHYA LAMA, S.K.,
TEOFILO MARTINEZ,

Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687- TLT

**DECLARATION OF JESSICA KARP
BANSAL IN SUPPORT OF PLAINTIFFS'
REPLY IN SUPPORT OF MOTION TO
POSTPONE EFFECTIVE DATE OF
AGENCY ACTION**

1 Additional Counsel for Plaintiffs

2 Jessica Karp Bansal (SBN 277347)

3 jessica@ndlon.org

4 Lauren Michel Wilfong (*Pro Hac Vice*)

5 lwilfong@ndlon.org

6 NATIONAL DAY LABORER

7 ORGANIZING NETWORK

8 1030 S. Arroyo Parkway, Suite 106

9 Pasadena, CA 91105

10 Telephone: (626) 214-5689

11 Eva L. Bitran (SBN 302081)

12 ebitran@aclusocal.org

13 Diana Sanchez (SBN 338871)

14 diana.sanchez@aclusocal.org

15 ACLU FOUNDATION

16 OF SOUTHERN CALIFORNIA

17 1313 West 8th Street

18 Los Angeles, CA 90017

19 Telephone: (213) 977-5236

20 Erik Crew (*Pro Hac Vice*)

21 ecrew@haitianbridge.com

22 HAITIAN BRIDGE ALLIANCE

23 4560 Alvarado Canyon Road, Suite 1H

24 San Diego, CA 92120

25 Telephone: (949) 603-7411

DECLARATION OF JESSICA KARP BANSAL

I, Jessica Karp Bansal, declare as follows:

1. I am an attorney at law duly licensed and entitled to practice in the State of California. I am an Attorney at National Day Laborer Organizing Network, counsel of record in this action for Plaintiffs. I have personal knowledge of the following facts and, if called as a witness, I could and would testify competently thereto.

2. I make this declaration in support of Plaintiffs' Reply in Support of Motion to Postpone Effective Date of Agency Action.

3. Attached hereto as **Exhibit 1** is a true and correct copy of a printed screen grab of a News Nation Video where President Trump says of Haitian TPS holders in Springfield, Ohio: "[Y]ou have to remove the people. We cannot destroy our country.... In my opinion, it's not legal.... They have to be removed." President Trump further responds to a question from the reporter asking, "So you would revoke the Temporary Protected Status," by stating, "Absolutely I would revoke it," at approx. 12:00, NewsNation (Oct. 2, 2024). The video is available for viewing at <https://www.newsnationnow.com/politics/2024-election/trump-springfield-haitian-migrants-removed/>.

4. Attached hereto as **Exhibit 2** is a true and correct copy of the U.S. Department of Homeland Security Press Release, dated July 7, 2025, *DHS Terminates TPS for Nicaragua: It was Never Meant to Last 25 Years*.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the Department of State Travel Advisory regarding Honduras dated December 10, 2024, urging travelers to reconsider traveling to Honduras due to crime, including "widespread" "[v]iolent gang activity, such as extortion, violent street crime, rape, narcotics, and human trafficking."

6. Attached hereto as **Exhibit 4** is a true and correct copy of the Department of State Travel Advisory regarding Nicaragua dated December 13, 2024, warning travelers to reconsider visiting Nicaragua "due to arbitrary enforcement of laws, the risk of wrongful detention, and limited healthcare availability."

7. Attached hereto as **Exhibit 5** is a true and correct copy of the Department of State Travel Advisory regarding Venezuela advising “Do not travel to Venezuela due to the high risk of wrongful detentions, terrorism, kidnapping, the arbitrary enforcement of local laws, crime, civil unrest, poor health infrastructure.”

8. Attached hereto as **Exhibit 6** is a true and correct copy of the Department of State Travel Advisory regarding Haiti dated July 15, 2025, advising “Do not travel to Haiti due to kidnapping, crime, terrorist activity, civil unrest, and limited health care.”

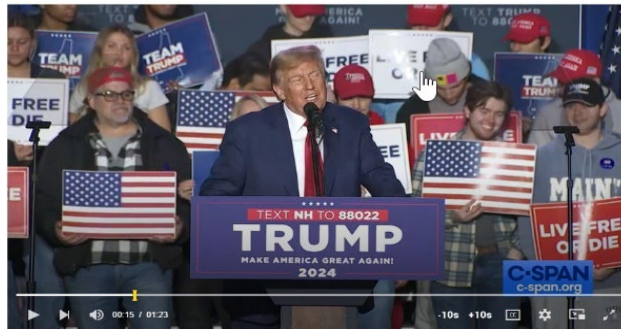
9. Attached hereto as **Exhibit 7** is a true and correct copy of the transcript of the speech President Trump gave addressing GOP Senators at Mar-a-Lago on February 7, 2025, stating that there were “murderers” and “prisoner[s]” “from Africa, from Asia, not just South America”, along with a screen grab below from the video clip at approx. 26:59–28:23. The video is available for viewing at: <https://perma.cc/EQ5-TSBP> and <https://rollcall.com/factbase/trump/transcript/donald-trump-speech-gop-senators-mar-a-lago-february-7-2025/>.



10. Attached hereto as **Exhibit 8** is a true and correct copy of the transcript of the speech President Trump gave at a political rally in Racine, Wisconsin on June 18, 2024, during which President Trump stated that very bad people” from “Congo and Africa,” “from Asia,” “from the Middle East,” and “from South America” have entered the United States “so illegally,” along with a screen grab below from the video clip at approx. 16:50-17:00. The video is available at: <https://perma.cc/D2LK-FRXW>.



11. Attached hereto as **Exhibit 9** is a true and correct copy of a news clip by Ginger Gibson, *Trump Says Immigrants Are “Poisoning the Blood of Our Country*, NBC News (Dec. 17, 2023), where President Trump stated “[t]hey’re poisoning the blood of our country . . . [N]ot just in South America, not just [the] three or four countries that we think about, but all over the world. They’re coming into our country from Africa, from Asia, all over the world.”, along with a screen grab of the video clip at approx. 00:12. The video is available for viewing at available at: <http://www.c-span.org/clip/campaign-2024/donald-trump-on-illegal-immigrants-poisoning-the-blood-of-our-country/5098439>, and <https://tinyurl.com/myvdd3yu>.



I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18th day of July 2025, at Claremont, CA.

/s/ Jessica Karp Bansal
Jessica Karp Bansal